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6 Attorney for Defendant  
 7 BACKGROUNDCHECKS.COM LLC  
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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

11 Melvin Washington,  
 Plaintiff,

12 v.  
 13

14 National Consumer Telecom & Utilities  
 Exchange, Inc.; Innovis Data Solutions, Inc.;  
 Clarity Services, Inc. and  
 Backgroundchecks.com LLC,

16 Defendants.

17  
 Case No. 2:24-cv-01618-JAD-DJA  
**JOINT MOTION**  
~~STIPULATION TO EXTEND TIME FOR~~  
**DEFENDANT**  
**BACKGROUNDCHECKS.COM LLC TO**  
**FILE RESPONSIVE PLEADING TO**  
**PLAINTIFF'S COMPLAINT**  
**[FIRST REQUEST]**

18 Plaintiff MELVIN WASHINGTON ("Plaintiff") and Defendant  
 19 BACKGROUNDCHECKS.COM LLC ("Defendant"), by and through their undersigned counsel,  
 20 hereby agree and stipulate to extend the time for Defendant to file a response to the Complaint from  
 21 the current deadline of November 4, 2024, up to and including **December 4, 2024**.

22 The requested extension is necessary in light of the fact the parties have begun discussions  
 23 regarding the scope and handling of the case and potential resolution of this matter. The additional  
 24 time will allow the parties to complete these discussions for efficiency before having to engage in  
 25 motion practice.

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1        This is the first request for an extension of time to respond to the Complaint. This request is  
 2 made in good faith and not for the purpose of delay.

3        Dated: October 25, 2024

4        Respectfully submitted,

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 6        */s/ Gerardo Avalos*  
 7 George Haines, Esq.  
 8 Gerardo Avalos, Esq.  
 9 FREEDOM LAW FIRM, LLC  
 10        *Attorneys for Plaintiff*  
 GWENDOLYN WASHINGTON

3        Dated: October 25, 2024

4        Respectfully submitted,

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 6        */s/ Diana G. Dickinson*  
 7 Diana G. Dickinson, Esq.  
 8 LITTLER MENDELSON, P.C.  
 9        *Attorney for Defendant*  
 BACKGROUNDCHECKS.COM LLC

11        **ORDER**

12        Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or their  
 13 attorneys will be treated - and must be filed - as a joint motion. The Court thus treats this filing as a  
 14 joint motion and will expect that future filings follow Local Rule 7-1(c). The Court GRANTS the  
 joint motion (ECF No. 13).

15        DATED: 10/28/2024

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 18        DANIEL J. ALBREGTS  
 19        UNITED STATES MAGISTRATE JUDGE